

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:05CR536
)	
Plaintiff,)	JUDGE PATRICIA A. GAUGHAN
)	
v.)	GOVERNMENT'S NOTICE
)	OF RESPONSE TO DEFENDANT'S
RONALD DAVIS,)	<u>REQUEST FOR DISCOVERY</u>
)	
Defendant.)	

Now comes the United States of America, by and through its counsel, Gregory A. White, United States Attorney, and Blas E. Serrano, Assistant United States Attorney, and responds to defendant's request for discovery under Federal Criminal Rule 16, as follows:

I. DISCOVERABLE MATERIAL

(a) (1) (A) and (B) - Defendant made an oral statement at the time of his arrest. A summary of the statement is being mailed under separate cover.

(a) (1) (D) - Mailed under separate cover is a copy of a printout of the defendant's criminal history.

-2-

(a)(1)(E) and (F) - The government will make available for inspection, copying, and photographing the items listed in Rule 16(a)(1)(E), documents and tangible objects. Mailed under separate cover is a computer disk (CD) containing all pertinent conversations wherein the defendant is a participant.

(a)(1)(F) and (G) - Reports of laboratory tests conducted are not available at this time, but will be mailed to counsel as soon as received.

The government does not anticipate the use of evidence pursuant to Rule 404(b) of the Federal Rules of Criminal Procedure. In the event that any evidence of this nature is discovered during the pendency of this case, the government will notify defense counsel of the intended use under Rule 404(b) with sufficient time for the defense to prepare for trial.

The attorney for the government has no knowledge of exculpatory evidence material to guilt or innocence of the defendant. The government will notify defense counsel of any exculpatory material discovered, if any, immediately upon such discovery in compliance with Brady v. Maryland. Other requests

-3-

made are outside the scope of discovery under Rule 16 of the Federal Rules of Criminal Procedure and legal precedents.

Respectfully submitted,

GREGORY A. WHITE
United States Attorney

By: s/ Blas E. Serrano
Blas E. Serrano
Assistant U.S. Attorney
Reg. No. 0009879
400 United States Court House
801 West Superior Avenue
Cleveland, Ohio 44113
(216) 622-3873 (phone)
(216) 522-7499 (facsimile)
Blas.Serrano@usdoj.gov

-4-

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of November 2005, a copy of the foregoing Government's Notice of Response to Defendant's Request for Discovery was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

s/ Blas E. Serrano
Blas E. Serrano
Assistant U.S. Attorney